

THOMAS J. ORR  
321 HIGH STREET  
BURLINGTON, NJ 08016  
tom@torrlaw.com  
(609)386-8700  
ATTORNEY FOR MADISON PLACE  
CONDOMINIUM ASSOCIATION

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In re

Lindsey Watson,

Debtor.

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

Chapter 13  
Case No. 23-18441 (ABA)

APPLICATION IN SUPPORT OF CONSENT  
ORDER RESOLVING PLAN OBJECTION AND  
CURING POST PETITION ARREARS

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Thomas J. Orr certifies as follows:

1. I represent Madison Place Condominium Association. The creditor is a community association servicing the debtor's property on Saxony Drive in Mt. Laurel, NJ.
2. On September 28, 2023, I filed an objection to the debtor's plan because it did not address pre-petition arrears.
3. I reached an agreement with debtor's counsel to allow the proof of claim to be bifurcated and to cure post-petition arrears outside the plan.
4. I certify that the statements made by me above are true. I am aware that if they are willfully false, I am subject to punishment.



/s/Thomas J. Orr  
Thomas J. Orr

Dated: May 5, 2024